

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: HAVERHILL TECHNOLOGY GROUP, INC., Debtor.	Chapter 7 Bankruptcy Case No. 03-43988-JBR
REPUBLIC BANK, INC., and TETRA FINANCIAL GROUP, L.L.C., Plaintiffs, vs. DAVID M. NICKLESS; HAVERHILL TECHNOLOGY GROUP, INC.; and JOHN DOES I through V, Defendants.	Civil Action No. 4:09-cv- 40133-GAO

ADDENDUM TO COMPLAINT

Pursuant to the Court's order of November 5, 2008, the Plaintiff, Tetra Financial Group, LLC, adds the following to the Amended Complaint (With Tetra Added As Plaintiff), previously served on January 2, 2008.

SEVENTH CAUSE OF ACTION

(Tetra v. Nickless: Money Had and Received)

And Plaintiff says that Defendant owes Plaintiff the sum of \$650,000 for money had and received from Plaintiff on or about January 16, 2004.

Wherefore, Tetra demands judgment against the defendant, David Nickless, personally and as he is trustee of Haverhill, in the amount of \$650,000, plus costs and prejudgment interest at the Massachusetts statutory rate of twelve (12) percent computed since the date he received Tetra's funds in January, 2004.

PLAINTIFF DEMANDS TRIAL BY JURY AS TO ALL CLAIMS SO TRIABLE.

DATED this 18th day of November, 2009.

Tetra Financial Group, L.L.C.

By their attorneys,

s/James B. Dolan

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent out electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/James B. Dolan

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